

## **EXHIBIT F**

# **BROWN REPLY DECLARATION ISO APPLE'S MOTION FOR SUMMARY JUDGMENT**

Deposition of Lori McAdams

In Re: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE )  
ANTITRUST LITIGATION )  
 ) No. 11-CV-2509-LHK  
THIS DOCUMENT RELATES TO: )  
ALL ACTIONS. )  
\_\_\_\_\_ )

CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEO DEPOSITION OF LORI McADAMS

AUGUST 2, 2012

Reported by: Rosalie A. Kramm, CSR No. 5469, CRR

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14:40:23 1 MS. HENN: I'm just going to object that you're  
14:40:25 2 mischaracterizing her testimony.

14:40:27 3 You can answer.

14:40:28 4 THE WITNESS: I don't think I spontaneously did  
14:40:29 5 anything. I think something came up from one of the  
14:40:31 6 recruiters about, do we still need to be careful about  
14:40:35 7 Apple candidates, which caused me to want to explore  
14:40:37 8 that, and the person I wanted to get confirmation that we  
14:40:40 9 didn't have to be cautious anymore from was Danielle. So  
14:40:46 10 I had a conversation with her about it, and after that  
14:40:49 11 conversation, we weren't going to proceed cautiously with  
14:40:54 12 Apple candidates anymore.

14:40:56 13 BY MR. GLACKIN:

14:41:01 14 Q. Now, I direct your attention -- so then you  
14:41:04 15 outline, there is some -- there are five bullet points.  
14:41:09 16 Do you agree that -- with me that the instructions you  
14:41:11 17 are giving your employees there are fairly comparable or  
14:41:15 18 similar to the agreement between Pixar and Lucasfilm  
14:41:18 19 about non-soliciting each other's employees and giving  
14:41:22 20 notifications about offers and so forth?

14:41:24 21 A. Yes, those bullet points are similar to the  
14:41:27 22 Lucasfilm agreement.

14:41:29 23 Q. Okay. And then you say, "Danielle will ask her  
14:41:33 24 Recruiting team to follow the same procedure, but given  
14:41:38 25 their scale, this isn't likely to apply to the retail

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14:41:41 1 organizations."

14:41:42 2 Is it true that Danielle agreed with you that  
14:41:47 3 she would ask her recruiting team to follow the same  
14:41:50 4 procedure?

14:41:51 5 A. I don't remember Danielle agreeing that she  
14:41:54 6 would follow this procedure. I don't remember having a  
14:41:59 7 conversation with her about these specific things.

14:42:01 8 Q. Do you deny that she agreed to do those things?

14:42:04 9 A. Again, I'm sorry, I can't deny or confirm  
14:42:07 10 something I don't remember.

14:42:12 11 Q. Then you say, "I will talk with Ed about this  
14:42:14 12 at my next 1-1 to confirm he's comfortable with it."

14:42:19 13 Did you ever talk to Mr. Catmull about this  
14:42:21 14 conversation you had with Ms. Lambert?

14:42:24 15 A. I don't remember ever talking to Ed about it.

14:42:27 16 Q. When you say, "my next 1-1," can you tell us  
14:42:30 17 what that refers to?

14:42:31 18 A. That means a one-on-one meeting.

14:42:33 19 Q. Did you have regular meetings with Mr. Catmull?

14:42:36 20 A. I didn't. When I had something I needed to  
14:42:38 21 talk with him about, then I would ask to meet with him.

14:42:57 22 Q. Do you deny that you told Ms. Lambert about  
14:42:59 23 your agreement -- about Pixar's agreement with Lucasfilm?

14:43:03 24 A. I don't remember my conversation with Danielle,  
14:43:06 25 so I don't know what I discussed with her.

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14:43:11 1 Q. Well, do you agree with me that if you were  
 14:43:12 2 going to reach a similar agreement with her, it would  
 14:43:14 3 have been logical for you to explain to her that you had  
 14:43:17 4 this agreement with Lucasfilm, and it had worked well in  
 14:43:20 5 the past?

14:43:21 6 MS. HENN: Objection. Calls for speculation.

14:43:22 7 THE WITNESS: Yeah, I don't -- I don't remember  
 14:43:24 8 a conversation with her, so I can't say what I would or  
 14:43:27 9 wouldn't have discussed with her with regard to  
 14:43:30 10 Lucasfilm's arrangement.

14:43:33 11 BY MR. GLACKIN:

14:43:33 12 Q. Was it her idea to have an agreement like this,  
 14:43:36 13 or was it your idea?

14:43:37 14 A. I don't remember the conversation.

14:43:39 15 MS. HENN: Objection. Assuming facts not in  
 14:43:41 16 evidence. Go ahead.

14:43:45 17 MR. GLACKIN: Okay. Let's go to Tab 24,  
 14:43:48 18 please. So this will be Exhibit 140.

14:44:06 19 (Exhibit 140 was marked for identification.)

14:45:06 20 THE WITNESS: Okay.

14:45:07 21 MR. GLACKIN: This is a document Bates numbered  
 14:45:09 22 PIX00004244.

14:45:13 23 BY MR. GLACKIN:

14:45:14 24 Q. Ms. McAdams, would you agree with me that this  
 14:45:16 25 is an email that you sent to Mr. Look -- or an exchange,

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1 I, Rosalie A. Kramm, Certified Shorthand  
2 Reporter licensed in the State of California, License No.  
3 5469, hereby certify that the deponent was by me first  
4 duly sworn and the foregoing testimony was reported by me  
5 and was thereafter transcribed with computer-aided  
6 transcription; that the foregoing is a full, complete,  
7 and true record of said proceedings.

8 I further certify that I am not of counsel or  
9 attorney for either of any of the parties in the  
10 foregoing proceeding and caption named or in any way  
11 interested in the outcome of the cause in said caption.

12 The dismantling, unsealing, or unbinding of the  
13 original transcript will render the reporter's  
14 certificates null and void.

15 In witness whereof, I have hereunto set my hand  
16 this day: August 9, 2012.

17  Reading and Signing was requested.

18  Reading and Signing was waived.

19  Reading and signing was not requested.

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22 ROSALIE A. KRAMM

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CSR 5469, RPR, CRR

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